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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

**\$1,724,802.75 IN UNITED STATES
CURRENCY, *in rem*,**

Defendant.

Case No: 3:23-cv-01573-MO

**COMPLAINT *IN REM* FOR
FORFEITURE**

Plaintiff, United States of America, by Natalie K. Wight, United States Attorney for the District of Oregon, and Katherine C. de Villiers, Assistant United States Attorney, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, \$1,724,802.75 in United States currency, was seized in the District of Oregon, and is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, \$1,724,802.75 in United States currency, represents substitute assets in lieu of proceeds that are directly traceable to violations of 18 U.S.C. § 1960, as the directly traceable funds are no longer available. The defendant currency is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Damian R. Platosh, Special Agent, Federal Bureau of Investigation, marked as Exhibit A, attached and fully incorporated herein by this reference. The Defendant currency was voluntarily turned over to the United States pursuant to the terms of a Non-Prosecution Agreement (“Agreement”) marked as Exhibit B, which is attached and fully incorporated herein by this reference. That Agreement, which is between the United States Attorney’s Office for the District of Oregon and Oregon Tool, Inc. (known during the relevant times as Blount, Inc.), provides that the government will file this civil forfeiture action against the Defendant currency, and that the government will ask the Court to treat the \$1,724,802.75 as the actual traceable proceeds of the 18 U.S.C. § 1960 violations set forth in the Agreement and corresponding Statement of Facts. The Agreement further provides that Oregon Tool will not file a claim in, or otherwise oppose, this

civil forfeiture case or assist any others with filing a claim in this case. *See* Exhibit B, ¶ 9.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendant, *in rem*, \$1,724,802.75 in United States currency; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this Defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

Dated: October 26, 2023.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Katie de Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney

VERIFICATION

I, Damian R. Platosh, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Federal Bureau of Investigation and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Damian R. Platosh
DAMIAN R. PLATOSH
Special Agent
Federal Bureau of Investigation